

REMARKS

Claims 1-18 are pending. Independent claims 1 and 11 are amended to clarify the intended and inherent scope of the claimed invention. No new matter has been added.

Section 103

Claims 1-2, 9, 11-13 and 18 stand rejected as being obvious over Moulinet et al. This rejection is respectfully traversed.

Contrary to the assertions in the Office Action, there is nothing in Moulinet et al. which teaches or describes a Convention Visitor Bureau (CVB) organization as claimed in independent claims 1 and 11. Specifically, the server system described in the middle column of Fig. 2 of Moulinet et al., for example, teaches away from the invention as claimed in independent claims 1 and 11. The server system of Moulinet et al provides for a store-and-forward function where there are no changes made to the RFP as originally submitted by a client and there are no changes made to each of the multiple responses to the RFP, with each separate response being prepared by a different individual service provider and including only information for that specific service provider. In addition, Moulinet et al. teaches a “winner-take-all” approach to awarding an RFP to a single one of the service providers as shown at block 154 of Fig. 2.

The “winner-take-all” approach for awarding a bid to one of a plurality of different responses to the RFP teaches opposite to the invention as claimed in independent claims 1 and 11. Independent claims 1 and 11 have been amended to highlight and clarify the inherent scope of the claimed invention that focuses on the preparation of a *aggregated* response to an RFP *by a CVB organization*, where that aggregated response incorporates the services provided by at least two different service providers who are members of that CVB organization.

With respect to the specific support cited for the rejection, it is respectfully submitted that there is nothing in Moulinet et al. which teaches “a projected service availability database

maintained by the application service provider *and accessible only by the CVB.*” The database referenced in the Office Action at paragraph [0037] of Moulinet et al. does not describe a limited access database, but instead describes a service provider qualifications database that is generally available to all clients, as well as other service providers:

“One actual embodiment of the invention is particularly useful for handling proposals for land surveying tasks. In this particular embodiment, land surveyors or firms providing land surveying services subscribe to a database that includes the firm's qualifications and the geographical areas in which the firm practices. Each potential customer accesses the database via a server system and searches for firms based on the type of surveying job required and the geographical area in which the survey is to be conducted.”  
Moulinet et al, Paragraph [0037]

The storage of the RFP at block 148 of Fig. 2 that is referenced in the Office Action at paragraph [0060] of Moulinet et al. does not describe a limited access *projected service availability database*, it is merely the storage on the server system implementing the store-and-forward approach which is the opposite of the invention as claimed in independent claims 1 and 11.

The arguments in the Office Action regarding the review of the projected service availability database and preparation of a response to the RFP based on availability of services from at least two providers are also not supported by the citations to Moulinet et al. The passage in the Office Action underscores the misapplication of the Moulinet et al reference to the claimed inventions when it is asserted that “client system receives and reviews the service provider’s response.” The client system in Moulinet et al is completely different than the server system which is originally recited in the Office Action as being the equivalent of the claimed CVB organization. Plainly, the client system of Moulinet et al. cannot be both the originator of an RFP and also the CVB organization that is responsible for reviewing the availability of services

of multiple service providers and generating a unified *response* to that RFP. The fact that the logic in the Office Action argues for the CVB organization to be read on completely different parts of the Moulinet et al system is confirmed by the very next passage in the Office Action which states that “server (CVB) notifies winning and non-winning service providers.” The client system and the system server of Moulinet et al. are two completely different and incompatible parts that cannot be indiscriminately applied to the same element of the CVB organization in arguing against the claimed invention.

Plainly, Moulinet et al. does not teach or describes a CVB organization as taught and claimed by the present invention. Moulinet et al. describes a clearinghouse server system that manages pass-through of an RFP from a client and the multiple, individual responses to that RFP from different service providers. Such a hands-off clearinghouse with no ability to generate an aggregated response to an RFP or provide limited access to a services availability database teaches away from the claimed invention. Accordingly, it is respectfully submitted that a *prima facie* case of the obviousness of the claimed invention of independent claims 1 and 11 has not been established.

With respect to dependent claims 3 and 13, it is respectfully submitted that the cited passage from Moulinet et al. again teaches directly opposite to the claimed invention. In Moulinet et al., it is the service provider, and not any CVB organization, that is making the changes their individual response to an RFP. “At block 294, *the service provider amends the proposal as desired, and at block 296, submits the amended proposal to the requesting client via the server system.*” Moulinet et al, [0089].

Claims 4-8 and 14-17 stand rejected as obvious over Moulinet et al in view of Tromczynski et al.. These rejections are also respectfully traversed for the reasons set forth above, as well as for the following additional reasons.

It is respectfully submitted that paragraph [0048] of Tromczynski et al. cited in the Office Action for tracking a process is describing a feature available to a meeting planner (i.e, the ultimate customer or client) who submits an RFP and want to keep track of changes in the RFP. There is nothing in the cited passage that references tracking changes to the *response* to the RFP that has been generated by the CVB organization.

With respect to the arguments made regarding dependent claims 7 and 16, it is respectfully submitted that the paragraph cited in Tromczynski et al [0038] teaches that it is the meeting planner who manually is keeping track of things like room availability from each service provider. The claimed invention of dependent claims 7 and 16, on the other hand, provides and automated way in which a CVB organization can effectively aggregate and keep track of room availability from multiple service providers as part of generating an aggregate "city- wide" response to an RFP. Again, the cited reference actually teaches away from the claimed invention by teaching tracking of availability by the client who generates the RFP, not by a CVB organization who is preparing an aggregated *response* to an RFP.

With respect to the arguments made regarding dependent claims 8 and 17, the paragraph cited in Tromczynski et al. [0038] teaches nothing at all of how the information about room rates, for example, is acquired or dealt with. In this regard, it is respectfully submitted that the teaching of Tromczynski et al. is not enabling for what is claimed in these claims. Tromczynski et al. deals only with a system from the perspective of a meeting plan user (i.e., the ultimate

customer or client) and does not address or even recognize the problems and challenges present in formulating and submitting an aggregated response to an RFP over a "city-wide" or "region-wide" basis by a CVB organization that will necessarily involve multiple service providers who are competitors with each other and will not want confidential information like room rates or room availability to be shared between competitors.

In view of the foregoing, it is submitted that this application is in condition for allowance. Favorable consideration and prompt allowance of the application are respectfully requested.

The Examiner is invited to telephone the undersigned if the Examiner believes it would be useful to advance prosecution.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'BP', with a long horizontal line extending to the right.

Brad Pedersen  
Registration No. 32,432,

Customer No. 24113  
Patterson, Thunte, Skaar & Christensen, P.A.  
4800 IDS Center  
80 South 8th Street  
Minneapolis, Minnesota 55402-2100  
Telephone: (612) 349-5774